

DECLARATION OF SPECIAL AGENT JUNE PINIEWSKI

I, June Piniewski, do hereby declare:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the United States Department of Justice, Federal Bureau of Investigation (FBI), and have been so employed since February 2015. As a Special Agent of the FBI, I am authorized to investigate violations of the criminal laws set forth in Title 18 of the United States Code. I am currently assigned to the Portland Division of the FBI where I investigate violations of federal law, including bank robberies, crimes against children, sex trafficking offenses, and other violent crimes. I have been involved in multiple investigations of matters involving sex trafficking, particularly as it relates to violations of 18 U.S.C. §§ 1591, 1952, 2421, and 2423. I have had extensive training in law enforcement investigation techniques including, but not limited to, 800 hours of training at the FBI's Academy at Quantico, Virginia. Prior to joining the FBI, I was a Deputy Sheriff in Hillsborough County, Florida, for approximately five years, where I participated in the investigation of various crimes, including violent crimes.

2. This declaration is being submitted in support of a Complaint *in rem* for Forfeiture of the following:

- a. 500 Domain Names, further described in Attachment A hereto, (hereafter **"Subject Domain Names"**);
- b. Lunarpages account associated with username "angel165" (hereafter **"Subject Lunarpages Account"**) that is stored at a premises owned, maintained, controlled, or operated by Add2Net, Inc. (doing business as

and hereinafter referred to as “Lunarpages”), an internet service provider headquartered at 1908 N. Enterprise St, Orange, California.

- c. DreamHost account associated with domain “folkspost.com” (hereafter **“Subject DreamHost Account”**) that is stored at a premises owned, maintained, controlled, or operated by DreamHost, LLC, an internet service provider headquartered at 707 Wilshire Boulevard, Suite 5050, Los Angeles, California,

as property used or intended to be used to commit or to facilitate the commission of a violation of 18 U.S.C. § 2421, namely interstate transportation of an individual for the purpose of prostitution. The **Subject Lunarpages Account** and **Subject DreamHost Account** (collectively **“Subject Server Accounts”**) and **Subject Domain Names** are therefore subject to forfeiture pursuant to 18 U.S.C. § 2428(b). The **Subject Domain Names** include supermatchescort.com, portlandasianescort.com, and folkspost.com, among others.

3. The statements contained in this declaration are based upon my own personal knowledge; knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers; interviews of witnesses; my review of records related to this investigation; communications with others who have knowledge of the events and circumstances described herein; and information gained through my training and experience. Because this declaration is submitted for the limited purpose of establishing probable cause in support of the civil forfeiture complaint, it does not set forth each and every fact that I or others have learned during the course of this investigation.

APPLICABLE LAW

4. 18 U.S.C. § 2421 makes it a federal felony for anyone to knowingly transport an individual in interstate or foreign commerce, with the intent that such individual engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense, or attempts to do so.

5. 18 U.S.C. § 2428(b) provides for civil forfeiture of “[a]ny property, real or personal, that was used or intended to be used to commit or to facilitate the commission” of violations including § 2421.

TECHNICAL BACKGROUND

6. Based on my training and experience and information learned from others, I am familiar with the following terms:

a. Internet Protocol Address: An Internet Protocol address (“IP address”) is a unique numeric address used by computers on the Internet. An IP address is a series of four numbers, each in the range 0–255, separated by periods (e.g., 121.56.97.178). Every computer attached to the Internet must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. An IP address acts much like a home or business street address—it enables computers connected to the Internet to properly route traffic to each other. The assignment of IP addresses to computers connected to the Internet is controlled by Internet Service Providers (“ISPs”).

b. Domain Name System: The domain name system (“DNS”) is, among other things, a hierarchical convention for domain names. A domain name is a simple, easy-to-remember way for humans to identify computers on the Internet, using a series of characters (e.g., letters, numbers, or other characters) that correspond with a particular IP address. Domain

names are composed of one or more parts, or “labels,” that are delimited by periods, such as “www.example.com.” The hierarchy of domains descends from right to left; each label to the left specifies a subdivision, or subdomain, of the domain on the right. The right-most label conveys the “top-level” domain. For example, the domain name “yahoo.com” means that the computer assigned that name is in the “.com” top-level domain and the “yahoo” second-level domain.

c. DNS Servers: DNS servers are computers connected to the Internet that convert, or resolve, domain names into IP addresses.

d. Registry: For each top-level domain (such as “.com”), there is a single company, called a “registry,” that determines which second-level domain resolves to which IP address. For example, the registry for the “.com” and “.net” top-level domains is VeriSign, Inc., which has its headquarters at 12061 Bluemont Way, Reston, Virginia.

e. Registrar & Registrant: Domain names may be purchased through a registrar, which acts as the intermediary between the registry and the purchasers of the domain name. The individual or business that purchases, or registers, a domain name is called a “registrant.” Registrants control the IP address, and thus the computer, to which their domain name resolves. Typically, a registrar will provide a registrant with the ability to change the IP address to which a particular domain resolves through an online interface. Thus, a registrant may easily change a domain name to resolve to another computer anywhere in the world. Registrars typically maintain customer and billing information about the registrants who used their domain name registration services.

f. WHOIS: A “WHOIS” search provides publicly available information as to which entity is responsible for a particular IP address or domain name. A WHOIS record for

a particular IP address or domain name will list a range of IP addresses that the queried IP address falls within and the entity responsible for that IP address range and domain name. For example, a WHOIS record for the domain name XYZ.COM might list an IP address range of 12.345.67.0–12.345.67.99 and list Company ABC as the responsible entity.

STATEMENT OF PROBABLE CAUSE

A. Sex Trafficking

7. I have received formal and on-the-job training in connection with the investigation of sex trafficking and related crimes. I have participated in several investigations that led to the arrest and conviction of traffickers and have become familiar with the habits, mannerisms, language, and techniques used in committing human trafficking offenses. I have also become familiar with the attempts to conceal the evidence of such occurrences from detection by both the public at large and law enforcement agencies. I have spoken with and have read documentation by officers who possess knowledge and expertise in the investigation of sex trafficking-related crimes. I have spoken to numerous victims of sex trafficking about their experiences in the life of prostitution. I have also participated in many different aspects of sex trafficking investigations, including conducting physical surveillance, interviews, reviewing electronic evidence, using confidential human sources, writing and executing search and seizure warrants, and making arrests. I have gained knowledge of the inner working of Sex Trafficking Organizations (“STOs”) and based on my training and experience know the following:

8. Prostitution is inherently a cash business as cash provides paying customers with some form of anonymity. STOs often move and launder the cash by placing it into bank accounts and investment accounts, using casinos to launder sources of cash, operating cash-based businesses such as restaurants, using wire transfers, and purchasing store value credit/debit cards,

Declaration of Special Agent June Piniewski

**Attachment B PAGE 5
Complaint *In Rem*
FOR FORFEITURE**

online e-currency, real estate, and other types of assets. STOs will often move the illegal proceeds several times through different forms of assets to make it difficult for law enforcement to discover the true source of the funds. STOs will often open legitimate businesses or have legitimate employment to launder the illegal proceeds and commingle these illegal funds with legitimate income from the business or employment to prevent law enforcement from discovering the true source of the proceeds.

9. Websites such as backpage.com,¹ adultsearch.com, supermatchescort.com, portlandasianescort.com, and others are often used by STOs to advertise commercial sex services. I know that STOs will often advertise their services as “massages” or “escorts” to avoid detection by law enforcement. The term “escort” is widely used as a euphemism for prostitution. I know that a legitimate escort is hired for an extended period such as several hours or even days, is expected to be attractive and presentable in public, and is often used to stand-in as a date for specific functions or entertainment for an evening. Escorts are paid for their time and their company, and sexual favors are not included as part of their services. Legitimate escorts or massage parlors do not list coded language for the services they provide such as GFE (Girlfriend Experience) or BBJ (Bare Blowjob). I also know that legitimate escorts or massage parlors do not typically advertise services posting sexually provocative photographs or by providing age, height, or the weight of the person providing the massage. Legitimate escort and massage businesses typically do not operate from an apartment or a motel room paid on a day-by-day basis. I also know legitimate escorts and masseuses do not perform

¹ On April 6, 2018, backpage.com (a classified ad website) and affiliated websites were seized and shut down by the United States due to their promotion of sex trafficking and prostitution.

sexual acts on their customers and therefore do not provide condoms or wear lingerie when interacting with the customer.

10. STOs post online ads for “escorts” or “massages” that investigators recognize as prostitution-related advertisements. The investigation has revealed the following roles within a STO:

- a. *Customers* – men who pay money for sexual acts
- b. *Providers* – individuals who perform sex acts for money
- c. *Drivers* – individuals who transport the providers and perform other activities such as collecting proceeds and delivering food or other supplies
- d. *Leasee* – individuals who lease the apartments that are used as brothels
- e. *Dispatcher* – individuals who answer the calls/texts/emails (responses to ads) from the customers, set up “dates” within the computer scheduling software, and notify the provider
- f. *Boss* – a supervisor of one or more brothel locations

11. Through this investigation, I have learned how STOs manage operations of the online ads. When a customer responds to the ad and calls the number associated with the ad, they are connected to “dispatch.” Dispatch identifies the location of the customer and assigns the customer to a specific provider for a “date” (an encounter for the purposes of engaging in a commercial sex act with the women). Dispatch then notifies the provider that a “date” has been set.

12. STOs arrange apartments and hotels for the provider to stay in and use for engaging in acts of prostitution. As part of this investigation, law enforcement has conducted over twenty undercover sting operations in Portland, Oregon, targeting Asian “escort” ads. In

Declaration of Special Agent June Piniewski

**Attachment B PAGE 7
Complaint *In Rem*
FOR FORFEITURE**

these sting operations, an undercover officer sets up a “date” using the contact phone number provided in the ad. After confirming the date and obtaining an address through the STO dispatch, the undercover officer is told to notify dispatch when they have arrived. Once the undercover has arrived, dispatch will provide the motel room number or apartment number.

13. Once inside the apartment, investigators notice very little furniture and that the bedroom in the apartment appears to be used only for sex acts. Investigators rarely see a bedframe and often the mattress has just a sheet with a towel laid on top. The nightstands next to the bed usually have multiple unused condoms on or near them, towels, and various bottles of oils and lubricants. The clothing in the closets or in the suitcases consist mainly of lingerie.

14. The STOs recruit women to work as providers from their respective countries (generally China or other Asian countries), and the women generally speak very little English. Some providers have indicated they are engaging in prostitution to repay certain costs, such as the cost of coming to the United States.

Chen STO

15. For the past two and a half years, I have been investigating sex trafficking, mainly focused on Asian STOs. As this investigation unfolded, I learned multiple agencies (both local and federal) across the country have encountered Asian STOs. The investigation revealed multiple Asian STOs, the main one of which is an international sex trafficking organization (hereafter referred to as the “Chen STO”) operating throughout the United States, Canada, and Australia. The following are known and indicted subjects in this current investigation:

a. ***Zongtao Chen, a.k.a “Mark” Chen (hereinafter “Chen”)*** – Chen is suspected of being the main facilitator for an Asian STO operating in the United States, Canada, and Australia. Chen is suspected of facilitating and coordinating the interstate and foreign travel

of women, primarily Chinese national females (“CNFs”), for criminal sexual activity, and of using online websites such as supermatchescort.com to promote prostitution. Chen is located in the Toronto, Ontario region.

b. *Yan Wang, a.k.a. “Sarah” Wang (hereinafter “Wang”)* – Wang is suspected of acting as dispatch for the Chen STO by setting up “dates” for the CNFs to engage in prostitution.

c. *Weixuan Zhou (hereinafter “Zhou”)* – Zhou is suspected of facilitating and recruiting CNFs in China and North America to work as prostitutes and of financing voluminous amounts of prostitution-related advertisements and domains, including the **Subject Domain Names**.

16. Between June 16, 2016 and July 10, 2016, the FBI received approximately 19 anonymous tips submitted to Crime Stoppers of Oregon that identified Zongtao Chen as a facilitator for an Asian STO operating in Canada and the United States. Chen is specifically named as the renter of several hotels and condominiums used by the STO in the United States and Canada.

17. One tip received on June 16, 2016, read,

International prostitution ring operating in Portland. When will you shut down this operator? They offer unprotected sex acts. 1,000’s of people are at health risk. Hotels and short term condo rentals is the way they do business. Mark Chen from Toronto may have a hand in the condo part of the business. He is a real estate broker. Advertisement today in Backpage: *Portland Asian Escort* Best Asian student *New Kelly 34DD*-19. Come to enjoy the best Asian experience, new Kelly, 19, 34DD, 100lbs, she will rock your world. Portland Downtown in call 503-850-2545 or 647-687-7096, WeChat: aa585466383 www.nyasianangels.com.

18. Another tip received on June 23, 2016, read,

Some tips for the international prostitution ring operating in your city: Mark Chen is a real estate broker from Toronto. Leader? Tenant Name: Zong Tao Chen (aka Mark Chen) Contact Phone Number 416-732-4321. Numbers used: WeChat: aa5854660383, call or text: 206-866-6735, call or text: 323-498-1660 347-594-5090, call or text: 503-850-2545 520-433-9310 . . .

The tip continued listing several other phone numbers and addresses.

Online Presence of the STO

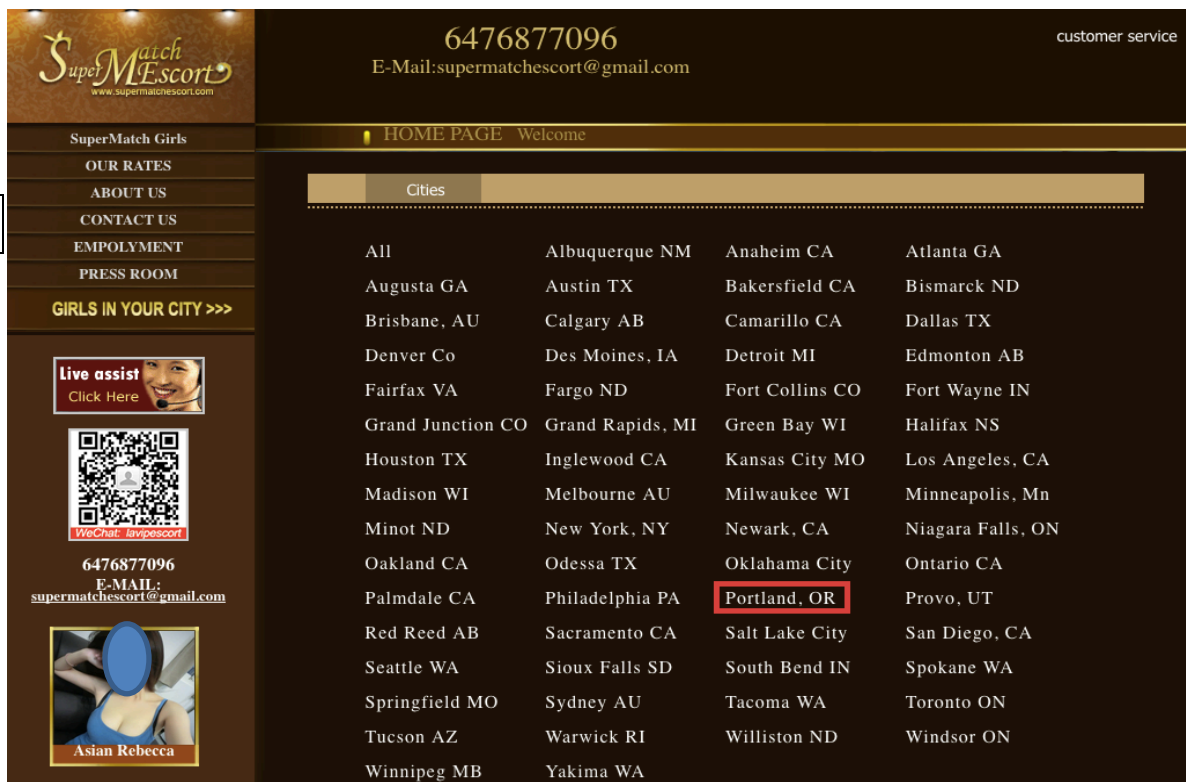
19. The Chen STO used supermatchescort.com as their main website to post online prostitution-related advertisements. The supermatchescort.com website displayed multiple pictures of Asian women posing in a provocative manner, often wearing lingerie or bikinis. (See Image A) The supermatchescort.com website had a menu listing their “supermatch girls,” the rates charged, a description of the site, a way to contact the site to set up “dates,” employment, a pressroom, and the “girls in your city.” Many of the advertisements also provided a description of the prostitution-related services they offered using coded language, such as BBJ (bare blowjob) and GFE (girlfriend experience – prostitution acts involving kissing). The supermatchescort.com website also linked to an email address, supermatchescort@gmail.com, a phone number, and a WeChat contact, which were used to carry out the criminal activities of the organization by allowing individuals to contact the Chen STO directly.



Image A

20. On the main page of the website “supermatchescort.com,” it read, “about us,” and then below read, “Super Match Escort, arrange you to meet with our professional Massages. They come from many different backgrounds. They are happy and fun to be accompanying with, let our Massages bring you the total enjoyment of life.” The advertisements were arranged by city corresponding to the areas the Chen STO services. (See Image B).

Image B



The screenshot shows the homepage of SuperMatch Girls. The header includes the logo, phone number 6476877096, email supermatchescort@gmail.com, and a customer service link. A navigation menu on the left lists: SuperMatch Girls, OUR RATES, ABOUT US, CONTACT US, EMPLOYMENT, PRESS ROOM, and GIRLS IN YOUR CITY >>>. The main content area is titled 'CITIES' and displays a grid of city names. The city 'Portland, OR' is highlighted with a red rectangular box.

CITIES			
All	Albuquerque NM	Anaheim CA	Atlanta GA
Augusta GA	Austin TX	Bakersfield CA	Bismarck ND
Brisbane, AU	Calgary AB	Camarillo CA	Dallas TX
Denver Co	Des Moines, IA	Detroit MI	Edmonton AB
Fairfax VA	Fargo ND	Fort Collins CO	Fort Wayne IN
Grand Junction CO	Grand Rapids, MI	Green Bay WI	Halifax NS
Houston TX	Inglewood CA	Kansas City MO	Los Angeles, CA
Madison WI	Melbourne AU	Milwaukee WI	Minneapolis, Mn
Minot ND	New York, NY	Newark, CA	Niagara Falls, ON
Oakland CA	Odessa TX	Oklahoma City	Ontario CA
Palmdale CA	Philadelphia PA	Portland, OR	Provo, UT
Red Reed AB	Sacramento CA	Salt Lake City	San Diego, CA
Seattle WA	Sioux Falls SD	South Bend IN	Spokane WA
Springfield MO	Sydney AU	Tacoma WA	Toronto ON
Tucson AZ	Warwick RI	Williston ND	Windsor ON
Winnipeg MB	Yakima WA		

Additional elements on the left sidebar include a 'Live assist' button with a 'Click Here' link, a QR code, contact information (6476877096, supermatchescort@gmail.com), and a profile picture of 'Asian Rebecca'.

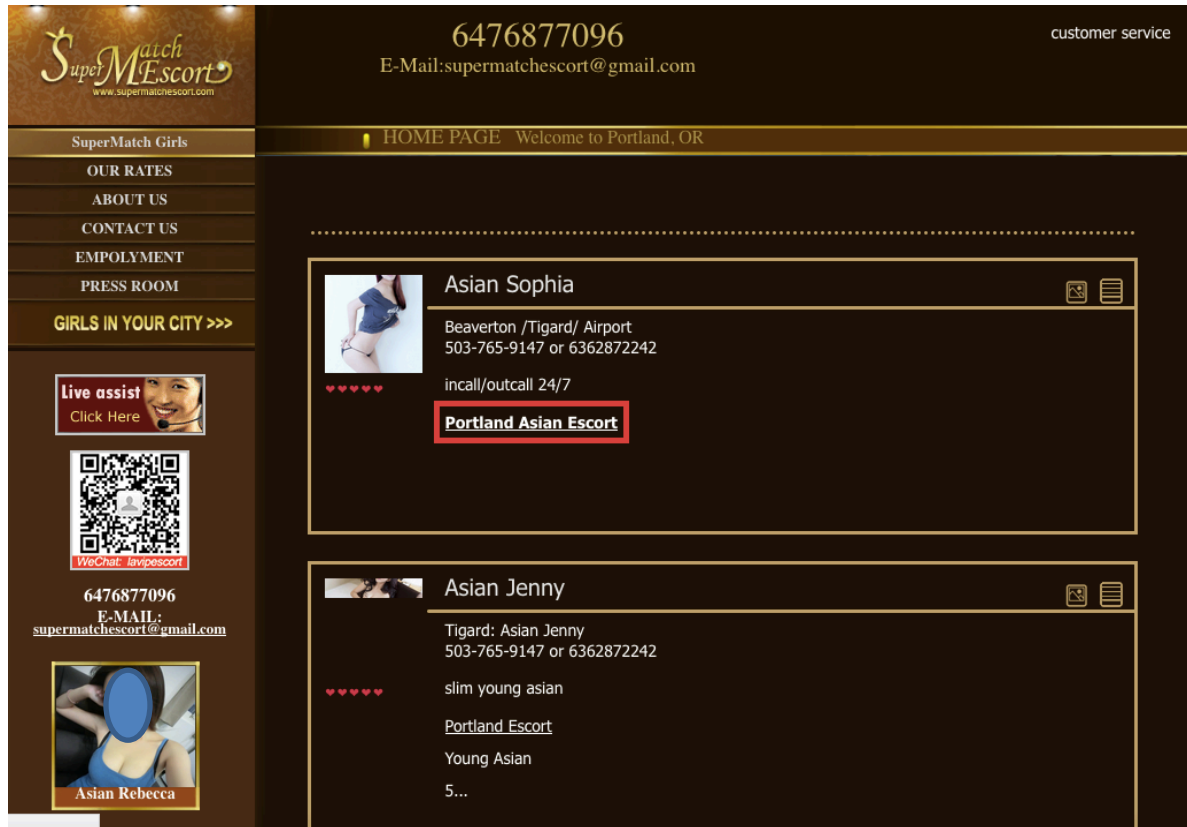
21. A majority of the cities had a secondary website that could be accessed from the “supermatchescort.com” website. When you clicked on “Portland, OR,” you were directed to providers available within Portland, OR. Each provider’s listings contained a link titled “Portland Asian Escort,” which redirected you to the website, “portlandasianescort.com.”

22. One of the listings for Portland, Oregon, was for “Asian Sophia” and read as follows:

Asian Sophia
 Beaverton/Tigard/Airport
 503-765-9147 or 6362872242
 Incall/outcall 24/7
PORTLAND ASIAN ESCORT
 Portland Escort Young, pretty, sexy

(See Image C).

Image C



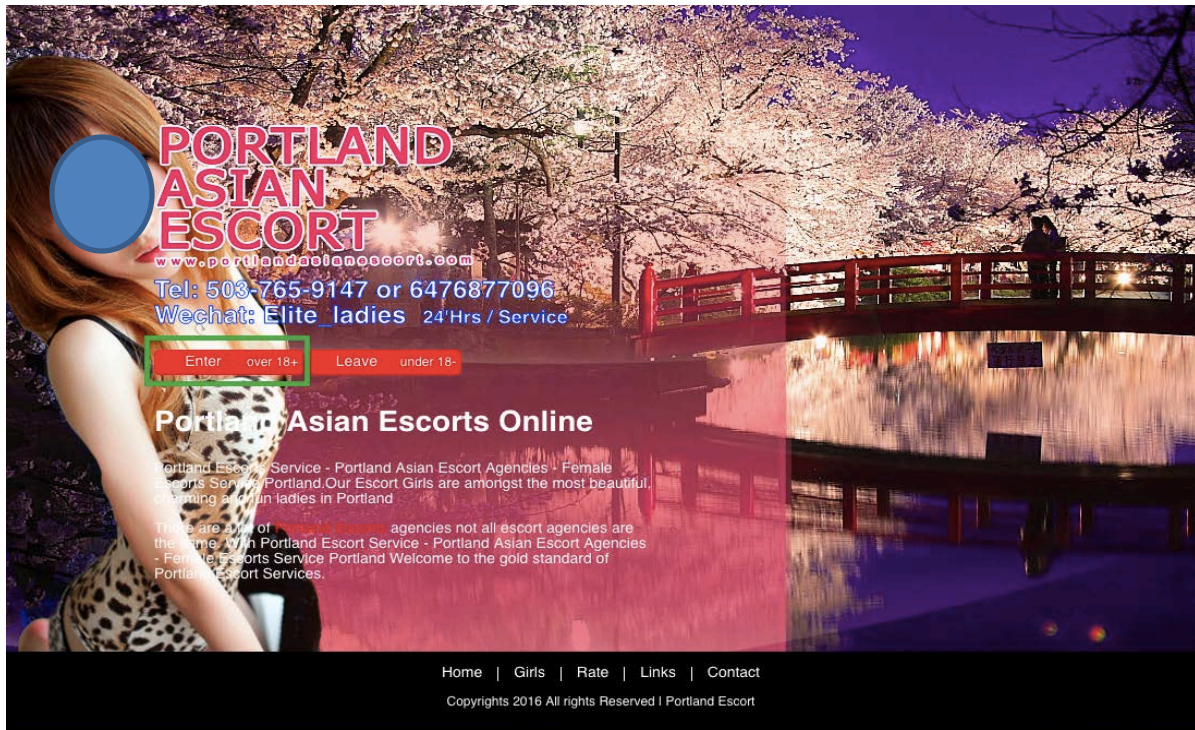
23. I know from my training and experience that “Incall/Outcall” are common terms used in escort service advertisements. “Incall” is where the customer comes to the provider’s location and “Outcall” is where the provider goes to the customer’s location.

24. On the website, www.portlandasianescort.com, the homepage stated,

Portland Asian Escort Tel: 503-765-9147 or 6362872242,
 WeChat:aa5854660383, 24 Hrs Service Portland Escorts Service –
 Portland Asian Escort Agencies – Female Escorts Service Portland
 Welcome to the gold standard of Portland Escort Services. We
 offers the best selection of Portland Escorts at the best price
 imaginable. Our Escort Girls are amongst the most beautiful,
 charming and fun ladies in Portland.”

(See Image D).

Image D

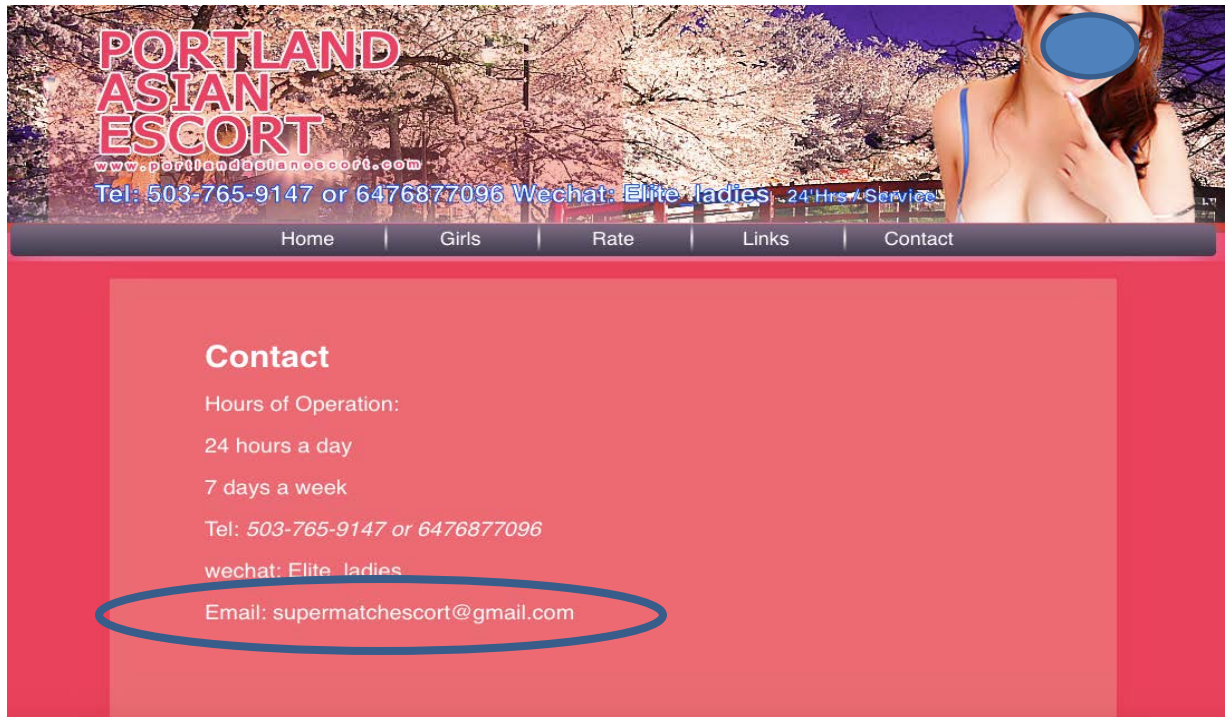


25. One advertisement stated the following on the photograph of an Asian female, “Shower Together, Bbj-kissing-69 Style, Young, Pretty, Sweet, Wet Tight Pussy, Licking-sucking-touching, Girlfriend Experience everything u want.”

26. Based on my experience, I know Bbj is a common term used among prostitution related ads to mean bare blowjob, which is oral sex without a condom. I also know 69 is a common term for an inverted sexual position where simultaneous oral sex occurs.

27. The email address under the contact portion of this website was supermatchescort@gmail.com. (See Image E).

Image E



28. Records from Google for subscriber information related to the email address supermatchescort@gmail.com identified the subscriber's name as Zongtao Chen, with a recovery email of markzongtaochen@gmail.com and a phone number of 416-732-4321. Through additional records and a search of law enforcement databases, I discovered other emails linked to Chen: markztchen@yahoo.ca, markzongtaochen@gmail.com, and chen_zong_tao@hotmail.com.

B. Customs and Border Protection contact with Chen

29. According to a Customs and Border Protection report, on May 12, 2016, the Alexandria Bay, New York point of entry encountered an Ontario-registered vehicle bearing tag BMMK280. Zongtao Chen was seeking entry to the United States to allegedly visit his girlfriend in New York City for three days. Chen was referred to a secondary inspection where CBP Officer Barkley interviewed Chen. The following is a summary of the interview with Chen:

Declaration of Special Agent June Piniewski

**Attachment B PAGE 15
Complaint *In Rem*
FOR FORFEITURE**

Chen stated he was a self-employed website designer and worked from home. He spent approximately three weeks in the United States on his last visit and returned home to Unionville, Ontario for three days to see his children and other friends. During the interview, Chen received numerous calls and messages on his cell phone. It was further discovered Chen was carrying the following: two cell phones, his wallet and papers related to a CTBC Bank account opened by Chen. The CTBC Bank paperwork was for a wire transfer in the amount of \$30,000 USD from Chen to Rui Li. Chen stated Rui Li was his ex-wife. The paperwork showed Chen had a total balance of \$49,490 in the CTBC Bank in NY account. The wallet contained several credit cards in his name as well as several business cards for banks in the New York City area.

Chen's Samsung Galaxy S5 was viewed and many images were found of Asian females posing provocatively. The phone also contained photos and related images that were consistent with advertisements relating to prostitution/escorts. Chen initially denied that he was operating or posting ads for escorts via the internet. The messages within the cell phone lists identified the owner as Mark C. Chen initially stated Mark C was a friend of his and later stated in the interview that he is actually Mark C. Chen stated he could not remember the address of his girlfriend even though he just spent three weeks with her in NYC. Chen later admitted that he posts ads for escorts on Backpage.com and several other websites. Chen also stated he handles the calls and arranges the dates. Chen initially said he only received \$1 to \$1.50 per ad for posting the ads, but later admitted that he actually received between eight and 10 percent of the money the escort made from her date. Chen also stated that he sometimes arranges drivers for the girls. It was observed that Chen was very evasive during the interview and repeatedly asked the same questions in order to get an answer.

C. Email Returns for Hotmail Email Address

Information showing chen_zong_tao@hotmail.com belongs to Mark Chen

30. A search warrant return from Hotmail for the content of the email address

chen_zong_tao@hotmail.com demonstrates that Mark Chen used the email address for personal

use, including documenting the U.S. addresses he used, presumably for bank cards. (See Image F).

Image F



31. Another email displays a picture of Mark, which is consistent with the appearance of the Mark Chen indicted in this case: (See Image G)

Image G



Hotmail email address linked to other emails, including supermatchescort@gmail.com

32. The warrant return showed that the Hotmail email address received emails from “Zongtao Chen” using the email address supermatchescort@gmail.com with two 5-digit numbers and the website escorts-canada.com in the subject line. (See Image H). This type of message lacking details and context is consistent with the same person using both email addresses.

Image H

Subject: http://www.escorts-canada.com
From: Zongtao Chen <supermatchescort@gmail.com>
Date: 4/7/2018 2:10 PM
To: zong_tao <chen_zong_tao@hotmail.com>

 22442
22445

33. The Hotmail email address also received email messages from its own email address with a prostitution-related website in the subject and body of the message. I later learned that Mark Chen suggested another STO use this website to advertise prostitution services. (See Image I).

Image I

Subject: skipthegames.com
From: zong_tao <chen_zong_tao@hotmail.com>
Date: 2/27/2017 3:09 AM
To: zong_tao <Chen_zong_tao@hotmail.com>

 skipthegames.com

34. The Hotmail address also received an email from markzongtaochen@gmail.com with the subject “email account” and body text “my email,” which may indicate he wanted to keep track of which email addresses he had set up for himself. (See Image J).

Image J

Subject: email account
From: Zongtao Chen <markzongtaochen@gmail.com>
Date: 12/15/2016 5:56 PM
To: "chen_zong_tao@hotmail.com" <chen_zong_tao@hotmail.com>

 my email

35. Another email, which was sent to the Hotmail address from supermatchescort@gmail.com, appears to be several examples in English for responses to men looking for dates. The responses contain what appears to be the addresses of brothels or hotels used as brothels in different cities across the United States and Canada. (See Image K).

Declaration of Special Agent June Piniewski

Attachment B PAGE 18
Complaint In Rem
FOR FORFEITURE

Image K

Subject: address
From: Zongtao Chen <supermatchescort@gmail.com>
Date: 12/16/2016 7:57 AM
To: chen_zong_tao@hotmail.com

—add2.txt—

Hi hun, I am at Commons inn - 5780 West St, Halifax, NS what time will you come?
 Hi hun, I am at 550 S Florence St, Wichita 67209.. what time will you come?
 Hi hun. I am at Residence & Conference Centre - Ottawa Downtown - 150 Hazel st, Ottawa K1S 5T8(1c5). what time is good for you?
 Hi hun, I am at 1828 S Wentworth Ave, Chicago IL 60616-4955. what time will you come hun? 140hh 180 h
 Hi hun, I am at 3160 West 8th St, Los Angeles, 90005 - Palga Grand hotel.. what time will you come?

 Hi hun, I am working at 4950 s outlet center dr, Tucson, az 85706,... what time is good for you?

 Hi hun. nice asian at 10160 114 st nw, edmonton. what time is good for you? 140hh 240 1h 100qv

 I am working at 10320 45 Ave NW, Edmonton. what time is good for you?

36. In numerous undercover operations, some of which are outlined below, after law enforcement officers would contact the number from an escort advertisement, law enforcement would receive a message addressed to “Hi hun” in a response similar to those above.

Travel records/money transfers

37. The Hotmail email search warrant also revealed numerous emails containing records of money transfers from individuals with Asian female names, some of which I know are involved in the Chen STO. I summarized the transaction details obtained from those emails, in part, below. (See Image L).

Image L

Transaction Date	Name	Transaction Amount
6/17/2018	Meihua Zhuang	\$350
6/3/2018	Meihua Zhuang	\$1,000
6/1/2018	Meihua Zhuang	\$680
5/30/2018	Meihua Zhuang	\$510
5/26/2018	Meihua Zhuang	\$300
5/23/2018		
5/19/2018	Meihua Zhuang	\$710
5/15/2018	Meihua Zhuang	\$500
4/30/2018	Ting Fu	\$1,500
4/19/2018	Ting Fu	\$1,000
4/3/2018	Lu Chen	\$614
2/18/2018	Ting Fu	\$1,125
2/23/2018	Li Hong	\$500
2/14/2018	Li Hong	\$1,000
2/10/2018	Ting Fu	\$1
2/8/2018	Ting Fu	\$1,000
2/2/2018	Lu Chen	\$30
2/3/2018	Ting Fu	\$500
2/3/2018	Lu Chen	\$170
2/2/2018	Lu Chen	\$30
2/2/2018	Lu Chen	\$200
2/1/2018	Lu Chen	\$100
1/31/2018	Lu Chen	\$70
1/30/2018	Lu Chen	\$110
1/28/2018	Ting Fu	\$300
1/27/2018	Ting Fu	\$250
1/27/2018	Ting Fu	\$1
1/24/2018	Wei-Yen Hsu	\$280
1/18/2018	Wei-Yen Hsu	\$1,000
1/16/2018	Wei-Yen Hsu	\$1,000
1/12/2018	Wei-Yen Hsu	\$1,000
1/9/2018	Wei-Yen Hsu	\$800
1/2/2018	Wei-Yen Hsu	\$100
12/28/2017	Meihua Zhuang	\$180
12/27/2017	Wei-Yen Hsu	\$500
12/27/2017	Meihua Zhuang	\$120
12/26/2017	Wei-Yen Hsu	\$295

38. Of note, this investigation identified Lu Chen as a provider out of Sioux Falls, South Dakota, as detailed later in this declaration.

Hotels Booked

39. The Hotmail email search warrant also revealed numerous emails containing hotel reservations for individuals with Asian female names, one of which I later identified as a

provider. I summarized the reservation details obtained from those emails, in part, below. (See Image M).

Image M

Jun-18	NAME	HOTEL	ADDRESS OF HOTEL
3rd-5th	Chia-Chi Yu	Candlewood Suites	2601 Abbott Plaza, omaha, NE 68110
3rd-5th	Yen-Yi Su	Comfort Inn & Suites	4822 East Washington Avenue, Madison, WI 53704
6th-8th	Yen-Yi Su	Rodeway inn & Suites	4400 S 27th Street, Milwaukee, WI 53221
6th-10th	Kwai C Wong	Microtel Inn & Suites	801 East 78th Street, Bloomington, MN 55420
May-18	NAME	HOTEL	ADDRESS OF HOTEL
10th-12th	Chia-Chi Yu	America's Best Value Inn	754 Horizon Drive, Grand Junction, CO 81506
12th-14th	Jianhong Li	Baymont	120 W University Dr, Mishawaka, IN 46545
13-15	Mei-Huan Chen	Microtel Inn & Suites	3820 4th Avenue West, Williston, ND
14-16	Ke Cheng	Clarion Inn & Suites	3370 East Battlefield Road, Springfield, MO 65804
15-18	Mei-Huan Chen	Home Place Lodge & Suites	1505 15th Avenue West, Williston, ND 58801
18-20	Yen-Yi Su	Super 8	5253 South Howell Avenue, Milwaukee, WI 53207
18-20	Chia-Yin Chang	Days Inn	1964 University Avenue West, Saint Paul, MN 55104
18-20	Kwai C Wong	Ramada by Wyndham	407 Lyons Avenue, Sioux Falls, SD 57106
22-24	Hong-Qin Wang	Extended Stay America	245 West Natick Road, Warwick, RI 02886
24-26	Hong-Qin Wang	Extended Stay America	3747 29th Street South East, Grand Rapids, MI 49512
24-26	Lixia Zha	Ramada by Wyndham	5601 Fortune Circle West, Indianapolis, IN 46241
26-28	Yanping Zhou	America's Best Value Inn	754 Horizon Drive, Grand Junction, CO 81506
26-28	Lixia Zha	America's Best Value Inn	3401 South Keystone Avenue, Indianapolis, IN 46237
26-28	Yimin Liang	Comfort Inn & Suites	4822 East Washington Avenue, Madison WI 53704
26-28	Lixia Zha	Americas Best Value Inn	3401 South Keystone Avenue, Indianapolis, IN 46237
28-30	Qirong Yuan	Motel 6	20 Jefferson Blvd, Warwick, RI 02888
Aug-17	NAME	HOTEL	ADDRESS OF HOTEL
10th-13th	Jianhong Li	Extended Stay America	7956 Lyndale Avenue S., Bloomington, MN 55420
15th-17th	Youchun Xiong	Portland Travelodge	1200 Brighton Avenue, Portland, ME 04102
17th-18th	Youchun Xiong	Motel 6	1 Riverside St, Portland, ME 04103
2nd-4th	Hong Chen	Quality Inn South Bluff	1165 S Bluff Street, St. George, UT 84770
Oct-17	NAME	HOTEL	ADDRESS OF HOTEL
2nd-4th	Hong Chen	Quality Inn South Bluff	1165 S Bluff Street, St. George, UT 84770

40. I found numerous emails sent to Mark Chen requesting a rating or review of hotel stays across the United States, made in the names of Asian females. (See Image N).

Image N

DATE OF EMAIL	NAME	HOTEL WITH CITY
4/19/2018	Li-Lun	Hawthorne Suites, Williston
3/27/2018	Min Luo	Woodspring Suites, Sioux Falls
3/19/2018	Min Luo	Comfort Suites, Sioux Falls
5/2/2018	Fang	Baymont by Wyndham, Grand Forks
5/15/2018	Hong-Qin Wang	Hawthorne Suites, Fargo
7/1/2017	Jianhong Li	Red Roof Inn, Rockford
7/27/2017	Jianhong Li	Microtel Inn & Suites Bloomington Minneapolis
8/9/2017	Jianhong Li	Motel 6, St Paul I-94

Transportation Booked

41. In the Hotmail email search returns, I discovered numerous flight reservations made in the names of Asian females. Some of the names used in the flight reservations correspond to names used for hotel reservations. I summarized the flight details obtained from those emails, in part, below. (See Image O).

Image O

2017 NAME	AIRLINE	DEPARTURE/ARRIVAL
11/1/2017 Xinrong Zhao	Delta	San Jose CA/Salt Lake City
9/19/2017 Ying Luan	WestJet	Montreal/Calgary
9/15/2017 Ying Luan	WestJet	Halifax/Calgary
8/11/2017 Youchun Xiong	Delta	Milwaukee/Los Angeles
8/22/2017 Youchun Xiong	American Airlines	Boston/Chicago
7/9/2017 Youchun Xiong	Delta	Portland OR/Tucson
7/15/2017 Youchun Xiong	Delta	Tucson/Atlanta
5/19/2017 Hongqin	Delta	Bismarck ND/NYC
5/18/2017 Yen Yi	Delta	NYC/Chicago
4/18/2017 Yu-Tai Hsu, Chi-Ling Hsu	Spirit	Minneapolis/Los Angeles
2018 NAME	AIRLINE	DEPARTURE/ARRIVAL
7-Jun Mei-huan Chen	United	Salt Lake City/Denver
18-May Chiayin Chang	Spirit	Los Angeles/Minneapolis
8-May Ke Cheng	Spirit	Los Angeles/Kansas City
14-Jan Hongbo Wang	Jetblue	Los Angeles/NYC

42. I also found several reservations for Greyhound Bus travel to and from destinations the Chen STO uses for prostitution operations, with the exception of Bend, Oregon. I summarized the bus details obtained from those emails below. (See Image P). Of note, one

Declaration of Special Agent June Piniewski

**Attachment B PAGE 22
Complaint *In Rem*
FOR FORFEITURE**

of the reservations specifically referenced billing “Zongtao,” which I believe is a reference to billing Mark Chen.

Image P	DATE	NAME	DEPARTURE/ARRIVAL	
	6/18/2018	Chia-Chi Yu	Sioux Falls/Fargo	
	6/6/2018	Kwai C Wong	Sioux Falls/Minneapolis	
	7/29/2017	Kwai C Wong	Las Vegas/St George	
	7/31/2017	Kwai C Wong	St George/Provo	
	2/25/2017	Xin Hong Liu	Portland OR/Bend	
	12/30/2016	Chunling Hou	Toronto/Ottawa	Billed to Zongtao

D. WeChat and CHS

43. The Chen STO uses a mobile application called, “WeChat,” to communicate, advertise, and send money. WeChat is a Chinese multi-purpose messaging, social media and mobile payment application. WeChat provides text messaging, hold-to-talk voice messaging, broadcast (one-to-many) messaging, video calls and conferencing, video games, sharing of photographs and videos, and location sharing. It can exchange contacts with people nearby via Bluetooth. Users can send previously saved or live pictures and videos, name cards of other users, coupons, or current GPS locations with friends either individually or in a group chat. WeChat users can set up a WeChat account by entering their phone number and then their Username or ID. Users can customize their profile by adding a profile image, which is displayed during a conversation.

44. A Confidential Human Source (“CHS”), who I have met with and whose true identity I know, came to the attention of the FBI from an investigation conducted by Homeland Security Investigations (HSI), Omaha Nebraska Division. This investigation involved a STO,

different from the Chen STO, using Extended Stay motels for prostitution. One of the subjects within their investigation was the CHS. The CHS, who speaks Mandarin Chinese, worked within the STO and organized the hotel reservations and “dates” for the providers in exchange for a portion of the money collected from the commercial sex acts. The CHS agreed to cooperate in the investigation of others involved in criminal activity in the hopes of future consideration. The CHS has no formal charges pending. The CHS has previously been arrested for a few misdemeanor prostitution charges and one felony prostitution-related charge.

45. On May 31, 2018, I met with the CHS who told me that a man named “Mark,” later identified as Mark Chen, has several brothels in multiple cities across the United States and Canada. In 2018, while working as a dispatcher for an unrelated STO, the CHS contacted Mark via WeChat to see if he would help find work for the providers. During this conversation, Mark suggested certain cities where the CHS’s providers could work and the expected number of customers available daily in these locations.

46. Also on May 31, 2018, the CHS directed me to website, “ca.51.” The website was mainly in Chinese, but at the top left was the word, “Canada” in English. In the middle of the website was a picture of an Asian male with glasses and next to the picture it read, “Mark Chen, Sales Representative, Re/Max Realtron Realty, Inc.” The CHS identified this photograph as the man she knows as Mark. This picture shows the same person as the one in the Hotmail email address photo from Image G. The website also listed phone number 416-732-4321 and email address markztchen@yahoo.ca. An FBI linguist translated the webpage and further discovered next to the name “Mark Chen” it stated, “Chen Zong Tao.”

47. The CHS then navigated to Mark's WeChat contact card in the CHS's phone. Mark's contact card contained a profile image of a red, orange, and yellow flower. There were two phone numbers listed for this contact: 416-732-4321 and 347-594-5090.

48. The CHS said that "Mark" texted her the following websites to use to post advertisements for prostitution: www.adultsearch.com, www.skipthegames.com, and www.adlist24.com. While working as a dispatcher, the CHS learned that "Mark" also uses the website "supermatchescort.com" to advertise providers who are involved in prostitution.

49. On May 31, 2018, the CHS, in my presence, navigated to a group conversation within WeChat. Within the group chat was the profile image of a red/orange and yellow flower, which was the same WeChat image the CHS showed me for "Mark." In the conversation next to the flower profile image was an advertisement. The advertisement was translated as, "Sincerely hiring/requesting female phone operator who knows computers, patient, hardworking, responsible, contact via WeChat." (See Image Q).



50. The CHS explained that each brothel location (apartment and/or hotel) that Mark operates has a separate WeChat group. Within each group, a dispatcher is also paired up with a provider.

51. The CHS identified one of Mark's WeChat groups, which is associated with a brothel operating out of a hotel in Omaha, Nebraska. This WeChat group contains ten different people. Each person has their own profile image. This Omaha WeChat group includes Mark's profile image. (See Image R).



52. The CHS stated that Mark monitors the numerous WeChat groups associated with the STO. The CHS stated that, Yan Wang, a friend of theirs, who lives in the Los Angeles area is currently working as a dispatcher for "Mark." The CHS identified Wang's WeChat profile image within the Omaha group. The CHS worked as a dispatcher in 2017 with Wang in California for a different STO. While working as dispatchers, the CHS and Wang shared the

same Apple iCloud and Store accounts. The email address that was associated to the Apple iCloud account was “redmoon9d@gmail.com.” The CHS learned that, as of September 2018, Wang no longer uses that iCloud account because Wang believes it is not safe and someone might find out where she is located.

E. Folkspost – Chen STO’s Online Scheduling Site

53. On July 3, 2018, the CHS provided a photograph s/he received via the iCloud account shared with Wang. I reviewed the picture, which was screenshot of a conversation that occurred on June 5, 2018, between Yan Wang and Mark Chen. In this screenshot, Mark sends the following to Wang, “folkspost.com/appt, User: lover, and Password: 6362872242.” Wang replies with a screenshot of a color-coded calendar. At the top of the calendar it reads, “Folkspost Online...” The CHS said that “Mark’s” dispatchers use a computer to answer the customers’ phone calls and then enter the “dates.” This was a copy of the calendar listing the dates.

54. On July 13, 2018, I executed a search warrant to Apple for the iCloud account: “redmoon9d@gmail.com” (the email address linked to the iCloud account). On July 24, 2018, Apple returned the search warrant results. Within the iCloud pictures folder was a screenshot of a text message between Wang and Chen. This screenshot was the same as the screenshot mentioned in the above paragraph.

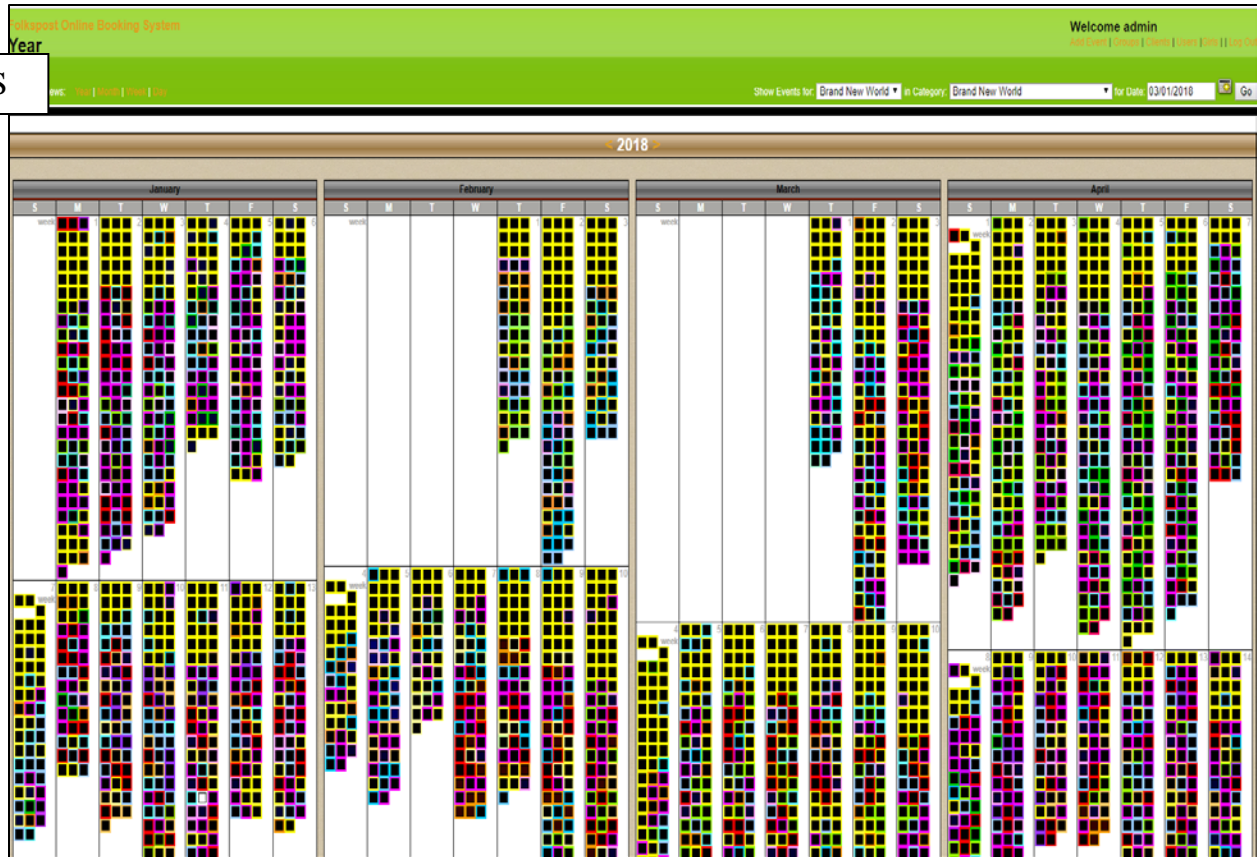
55. Also within the pictures folder is an image of a screenshot with the main webpage, www.folkspost.com displayed. Within that webpage the year “2012” appears and a space to log in with a username and password.

56. A search of the publicly available WHOIS records revealed folkspost.com is assigned to IP address 64.90.44.191. I also learned from publicly available records that this IP address is registered to DreamHost, LLC.

Search Warrant Returns

57. I obtained a search warrant for the information contained on “folkspost.com” and executed the warrant on the server hosting company DreamHost, LLC. These records revealed that the Web ID associated with the account containing folkspost.com is “junsun1”. The registered user for this account is Junfeng Sun, with multiple addresses in the Toronto, Ontario region. The email address on the account is sunjunfeng@gmail.com and the phone number is 905-518-2768. 905 is an area code assigned to Southern Ontario. Folkspost.com is the only domain associated with this Web ID. Payment for this hosting account was made from Paypal email hotjsjf@gmail.com and a credit card under the name of Junfeng Sun.

58. From these returns and the CHS information, I learned that the Chen STO (mainly the dispatchers and Mark) uses “folkspost.com” as an online booking system. I learned that the database operates as a calendaring system. The image below shows an overview of the calendar of “dates” for the first four months of 2018. (See Image S).



Declaration of Special Agent June Piniewski

Attachment B PAGE 29
Complaint *In Rem*
FOR FORFEITURE

59. The image below shows the dates for the first week of April 2018. (See Image T).

Winkpost Online Booking System

Welcome admin

Month

Calendar Views: [Year](#) | [Month](#) | [Week](#) | [Day](#)

Show Events for: **Brand New World** In Category: **Brand New World** for Date: **04/01/2018** Go

Image T

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
12:00 AM - 12:30 AM 6514045929--Bloomington Selina(terxio)	12:00 AM - 12:30 AM 2187602563--Williston Jenny(terxio)	12:00 AM - 1:00 AM 7472793852--LA outcall I lily(shy)	12:00 AM - 12:30 AM 7016094437--Williston Jenny(faith)	12:00 AM - 1:00 AM 6122717867--LA outcall I lily(shy)	12:00 AM - 1:00 AM 2133269686--LA outcall I lily(shy)	12:00 AM - 1:00 AM 9175456381--LA outcall I lily(shy)
12:00 AM - 1:00 AM 6143072009--LA outcall Lily(shy)	12:00 AM - 1:00 AM 7733097644--LA outcall Lily(shy)	12:00 AM - 1:00 AM 9403106845--LA outcall Lily(shy)	12:00 AM - 1:00 AM 3104977742--LA outcall Lily(shy)	12:00 AM - 1:00 AM 3104977742--LA outcall Lily(shy)	12:00 AM - 1:00 AM 6612128162--LA outcall Lily(shy)	12:00 AM - 1:00 AM 2132145747--LA outcall Lily(shy)
12:00 AM - 1:00 AM 3104906684--LA outcall Lily(shy)	12:00 AM - 1:00 AM 4252832691--LA outcall Lily(shy)	12:00 AM - 1:00 AM 9548494287--LA outcall Lily(shy)	12:00 AM - 1:00 AM 4242711414--LA outcall Lily(shy)	12:00 AM - 1:00 AM 3109165372--LA outcall Lily(shy)	12:00 AM - 1:00 AM 8023550312--LA outcall Lily(shy)	12:00 AM - 1:00 AM 9166281868--LA outcall Lily(shy)
12:00 AM - 1:00 AM 3109716231--LA outcall Lily(shy)	12:00 AM - 1:00 AM 2122031960--LA outcall Lily(shy)	12:00 AM - 1:00 AM 4028891373--LA outcall Lily(shy)	12:00 AM - 1:00 AM 9493555912--LA outcall Lily(shy)	12:00 AM - 1:00 AM 2027357757--LA outcall Lily(shy)	12:00 AM - 1:00 AM 2027357757--LA outcall Lily(shy)	12:00 AM - 1:00 AM 3232717930--LA outcall Lily(shy)
12:00 AM - 1:00 AM 2137251759--LA outcall Lily(shy)	12:00 AM - 1:00 AM 2679127005--LA outcall Lily(shy)	12:00 AM - 1:00 AM 5164556774--LA outcall Lily(shy)	12:00 AM - 1:00 AM 7692032679--Sioux Falls lily(faith)	12:00 AM - 1:00 AM 6317404352--LA outcall Lily(shy)	12:00 AM - 1:00 AM 9028776325--Halifax Sophie(elea)	12:00 AM - 1:00 AM 9176531258--LA outcall Lily(shy)
12:00 AM - 1:00 AM 3104868178--LA outcall Lily(shy)	12:00 AM - 1:00 AM 9492399706--LA outcall Lily(shy)	12:00 AM - 1:00 AM 7807167960--Edmonton South Vivian(faith)	12:00 AM - 1:00 AM 256440061--Fort Collins Coco(faith)	12:00 AM - 1:00 AM 4035961888--Red Deer Jessica(elea)	12:00 AM - 1:00 AM 9703960948--Fort Collins Coco(faith)	12:00 AM - 1:00 AM 8186458824--LA outcall Lily(shy)
12:00 AM - 1:00 AM 6266241228--LA outcall Lily(shy)	12:00 AM - 1:00 AM 4803525500--LA outcall Lily(shy)	12:00 AM - 1:00 AM 3233264897--LA outcall Lily(shy)	12:00 AM - 1:00 AM 2117094646--LA outcall Lily(shy)	12:00 AM - 1:00 AM 9025636759--Halifax Sophie(elea)	12:00 AM - 1:00 AM 5629688981--LA outcall Lily(shy)	12:00 AM - 1:00 AM 587787171--Edmonton South Amy(terxio)
12:00 AM - 1:00 AM 3235561013--LA outcall Lily(shy)	12:00 AM - 1:00 AM 3107401272--LA outcall Lily(shy)	12:00 AM - 1:00 AM 3104969503--LA outcall Lily(shy)	12:00 AM - 1:00 AM 628888634--LA outcall I lily(shy)	12:00 AM - 1:00 AM 3233796364--LA outcall Lily(shy)	12:00 AM - 1:00 AM 3109028698--LA outcall I lily(shy)	12:00 AM - 1:00 AM 7013061652--Fargo Leah(terxio)
3:00 AM - 4:00 AM 8182535589--LA outcall Lily(shy)	3:00 AM - 4:00 AM 4038634401--calgary NE Bobo(elea)	3:00 AM - 4:00 AM 8187479961--LA outcall Lily(shy)	3:00 AM - 4:00 AM 2029440545--LA outcall Lily(shy)	3:00 AM - 4:00 AM 4028891373--LA outcall Lily(shy)	3:00 AM - 4:00 AM 3109415943--LA outcall Lily(shy)	3:00 AM - 4:00 AM 7015809190--Williston Jenny(japer)
3:00 AM - 4:00 AM 3106787603--LA outcall I lily(shy)	3:00 AM - 4:00 AM 9172944571--Fort Collins Coco(terxio)	3:00 AM - 4:00 AM 4243355245--LA outcall I lily(shy)	3:00 AM - 4:00 AM 4082397065--LA outcall Lily(shy)	3:00 AM - 4:00 AM 9087207584--LA outcall I lily(shy)	3:00 AM - 4:00 AM 3104635929--LA outcall Lily(shy)	3:00 AM - 4:00 AM 26767012639--Fort Wayne Jenny(mark)
3:00 AM - 4:00 AM 3233841265--LA outcall Lily(shy)	3:00 AM - 4:00 AM 8184222723--LA outcall Lily(shy)	3:00 AM - 4:00 AM 3234010342--LA outcall Lily(shy)	3:00 AM - 4:00 AM 7147591177--LA outcall Lily(shy)	3:00 AM - 4:00 AM 3233036575--LA outcall Lily(shy)	3:00 AM - 4:00 AM 4243853356--LA outcall Lily(shy)	3:00 AM - 4:00 AM 5035518684--Portland Airport hy(Dengpao)
3:00 AM - 4:00 AM 6195491648--LA outcall Lily(shy)	3:00 AM - 4:00 AM 8104258500--LA outcall Lily(shy)	3:00 AM - 4:00 AM 9177342334--LA outcall I lily(shy)	3:00 AM - 4:00 AM 3104608351--LA outcall Lily(shy)	3:00 AM - 4:00 AM 2139957650--LA outcall Lily(shy)	3:00 AM - 4:00 AM 3235715314--LA outcall Lily(shy)	3:00 AM - 4:00 AM 6052511510--Sioux Fall Jenny(japer)
3:00 AM - 4:00 AM 9089109907--LA outcall I lily(shy)	3:00 AM - 4:00 AM 3233810407--LA outcall Lily(shy)	3:00 AM - 4:00 AM 7577541955--LA outcall Lily(shy)	3:00 AM - 4:00 AM 6192455550--LA outcall Lily(shy)	3:00 AM - 4:00 AM 7474441353--LA outcall I lily(shy)	3:00 AM - 4:00 AM 2607014388--Fort Wayne Jenny(faith)	3:00 AM - 4:00 AM 7124417387--Sioux Fall Jenny(japer)
3:00 AM - 4:00 AM 3234016942--LA outcall Lily(shy)	3:00 AM - 4:00 AM 4242818441--LA outcall Lily(shy)	3:00 AM - 4:00 AM 6053669575--Sioux Falls lily(faith)	3:00 AM - 4:00 AM 7016417327--Williston Jenny(mark)	3:00 AM - 4:00 AM 5879881205--Edmonton South Vivian(faith)	3:00 AM - 4:00 AM 7017156130--Williston Jenny(faith)	3:00 AM - 4:00 AM 1020 AM - 10:10 AM 7124417387--Sioux Fall Jenny(japer)
3:00 AM - 4:00 AM 7809093223--Edmonton South Amy(Juskson)	3:00 AM - 4:00 AM 4242818441--LA outcall Lily(shy)	3:00 AM - 4:00 AM 7016417327--Williston Jenny(mark)	3:00 AM - 4:00 AM 3236710056--LA outcall Lily(shy)	3:00 AM - 4:00 AM 3238791433--LA outcall Lily(shy)	3:00 AM - 4:00 AM 3238791433--LA outcall Lily(shy)	3:00 AM - 4:00 AM 3238791433--LA outcall Lily(shy)

Declaration of Special Agent June Piniewski

Attachment B PAGE 30
Complaint *In Rem*
FOR FORFEITURE

60. Within the system, a user can sort the data by year, month, day, or a specific provider. The website also contains a drop down menu to allow searching by Country/City. (See Image U).

Image U

Brand New World
Brand New World
__Australia
__Brisbane
__Brisbane Jenny
__Melbourne
__Melbourne Jenny
__Sydney
__Sydney amy
__Canada
__Alberta
__Calgary
__calgary NE Bobo
__Calgary NE Yoyo
__Calgary outcall Jojo
__calgary sw(DT)
__Edmonton
__Edmonton Leah
__Edmonton South Amy
__Edmonton South Vivian
__Fort McMurray


61. The booking system also contains a “client” database, which appears to contain the customer’s phone numbers. The client database is “searchable” by phone numbers. The client’s phone number and number of visits are listed. (See Image V).

Image V

Folkpost Online Booking System
Edit Clients

Calendar Views: [Year](#) | [Month](#) | [Week](#) | [Day](#)

Select Client <-> Brand New World

 All Types

Secure number:

Client Name:

Email:

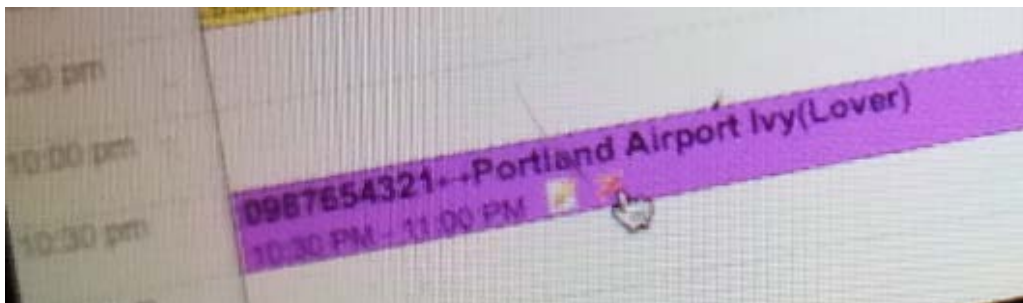
Type:

Nex > >> Page 1/1070 Total Clients: 32094

Client Name	Client E-mail	Phone/Secure #	Client Type	Visits	Client Active	Action
		3232075698		1	✓	
		7609176649		1	✓	
		8016036377		1	✓	
		7143819838		1	✓	
		6198087102		1	✓	
		3104026082		1	✓	
		4704391635		1	✓	
		2057325636		1	✓	
		7202707136		1	✓	
		6572551154		1	✓	

62. Each date is color-coded and viewed in the calendar as such: the time, the customer's phone number, the city, the provider, and the dispatcher. (See Image W).

Image W



Declaration of Special Agent June Piniewski

Attachment B PAGE 32
Complaint *In Rem*
FOR FORFEITURE

63. After the date is made, it is the dispatcher's responsibility to notify the provider, usually via the WeChat group.

F. Direct association between WeChat, Folkspost, and Mark Chen

64. According to a Sioux Falls Police Department report, on April 18, 2018, an employee of a hotel in the area of West 34th Street and South Carolyn Avenue contacted the Sioux Falls Police Department. The employee told the officers they believed the customer in room 406 was engaging in prostitution. The employee stated several men a day were visiting the room for less than an hour and the customer paid for their room with cash.

65. On April 23, 2018, the Street Crime Unit was working in an undercover capacity and targeting online advertisements that they knew, from their experience, were often used to advertise acts of prostitution. The undercover officer sent a text message to the number listed in the ad asking if he would be able to come see her (the escort posted in the ad). The phone number listed in the advertisement gave the same address to the hotel and stated their rates were \$150 for a half hour (hh) and \$200 for an hour (h). Just as the undercover officers were about to go to room 406, at 7:51 p.m one of the officers witnessed a male knock on the door of room 406 and then enter. The male exited room 406 at 8:01 p.m. and entered his vehicle. The officers conducted a traffic stop on that vehicle and learned the male inside the vehicle found an advertisement on "adultsearch.com" and contacted the phone number listed in the advertisement using his phone. The man's phone number was (605) 359-4990. The officers observed a strand of text messages starting at 6:51 p.m. The male sent a text message to the phone number listed in the advertisement. The phone number responded, "Yes hon hi hon I am at 2725 South Carolyn Avenue, Sioux Falls, South Dakota 57106. 150 hh 200h no black gentleman please.

What time is good for you honest?" The male scheduled a "date" for 7:45 p.m. When the male

Declaration of Special Agent June Piniewski

**Attachment B PAGE 33
Complaint *In Rem*
FOR FORFEITURE**

stated he had arrive he received a text that said, “Room 406 come in now.” He stated that he received a “happy ending” after his massage. When asked what he meant by a “happy ending” he stated a “hand job.” A “hand job” is a common term used by people to describe the manual stimulation of a man’s penis until ejaculation. The male admitted to paying the woman inside room 406, \$150.00. He stated once he gave the woman (an Asian female) the \$150.00, he took off all his clothes and laid on the bed. He received a back massage from the female for a little while and then rolled over and received a hand job.

66. The undercover officers entered room 406, identified the Asian female as Lu Chen and interviewed her. During the interview, Lu Chen told them that while using WeChat, she saw ads recruiting women for work. She reached out to one of the ads and began speaking to an individual she called Zongtao Chen. She frequently referred to him as an “owner.” Zongtao Chen told her to come to Sioux Falls and to report to a specific hotel. Once at the hotel, she said “operators” began setting up “dates” for her and sending men to her room. She did not know any of the name of the “operators.” She showed the officers the WeChat group “Sioux Falls 406.” She sent portions of her income to Zongtao Chen. For example, if she received \$150.00 from a customer for a half hour, she would pay Zongtao Chen \$50; if she makes \$200.00, she would send Zongtao Chen \$80.00. She said she normally pays Zongtao Chen by contacting her sister in China and instructing her to pay Zongtao Chen in Chinese money. A couple times, she has transferred Zongtao Chen money through her Wells Fargo Bank account.

67. She showed officers the email address she had for Zongtao Chen, which was chen_zong_tao@hotmail.com and the phone number of 416-732-4321. The search warrant

returns from Mark Chen's Hotmail email address revealed emails documenting multiple wire transfers from Lu Chen to Mark Chen.

68. A review a Lu Chen's WeChat conversations revealed the following:

69. In one group that read "Sioux Falls 406," the beginning of the conversation appears to start with names I recognized as being also users/dispatchers in "folkspost.com": "juskson," "ferxio," and "japer." (Compare Image X (WeChat message) and Image Y, below (folkspost calendar)).

Image X



Image Y



70. I also observed another WeChat conversation between Lu Chen and Zongtao Chen which revealed that on March 10, 2018, Zongtao Chen provided Lu Chen the name of the Days Inn hotel in St Paul, Minneapolis. (See Image Z). Then on March 21, 2018, he provided his phone number, “416-732-4321” and the hotel “My Place hotels fargo” with an address of “2555 55th St, Fargo, ND 58104.” (See Image AA). It is my understanding that he was asking Lu Chen to travel to these cities and hotels to engage in prostitution.

Image Z

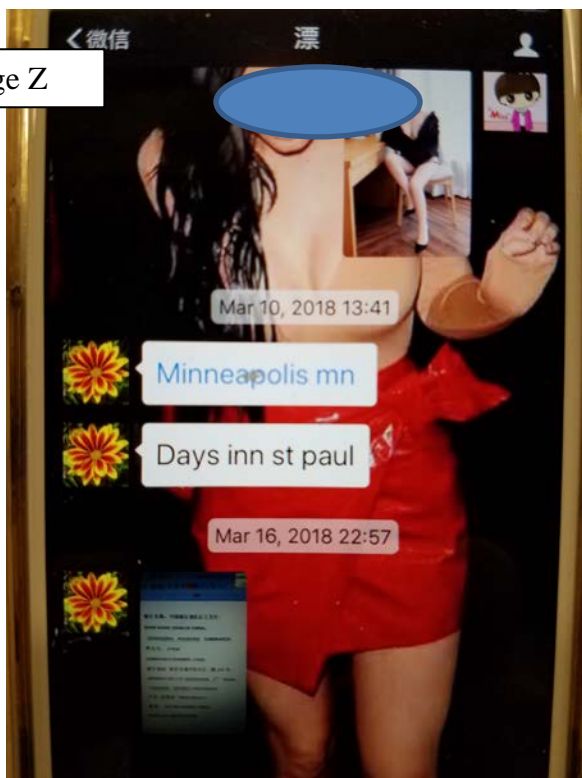
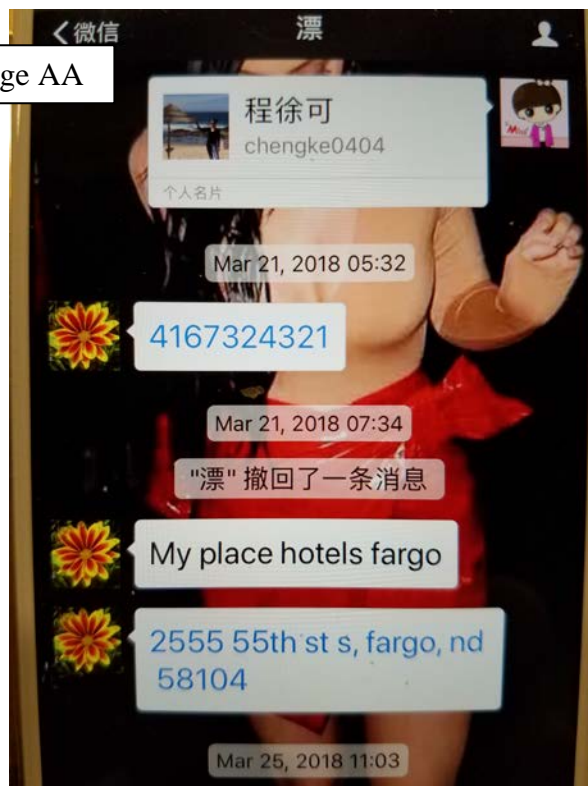


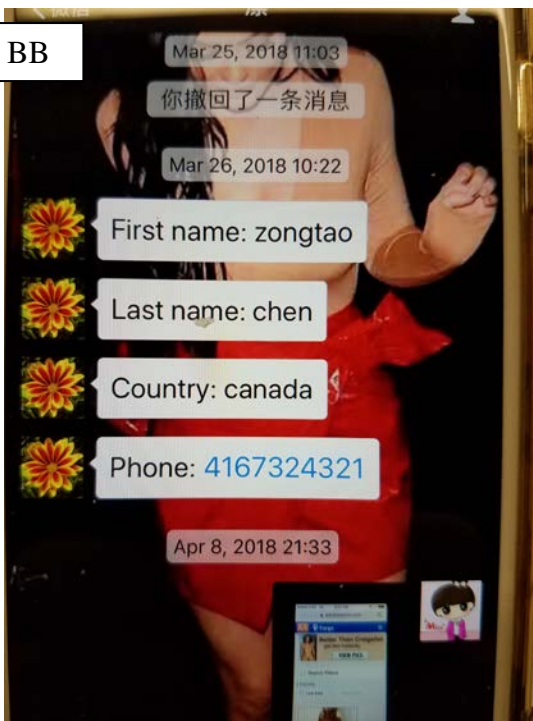
Image AA



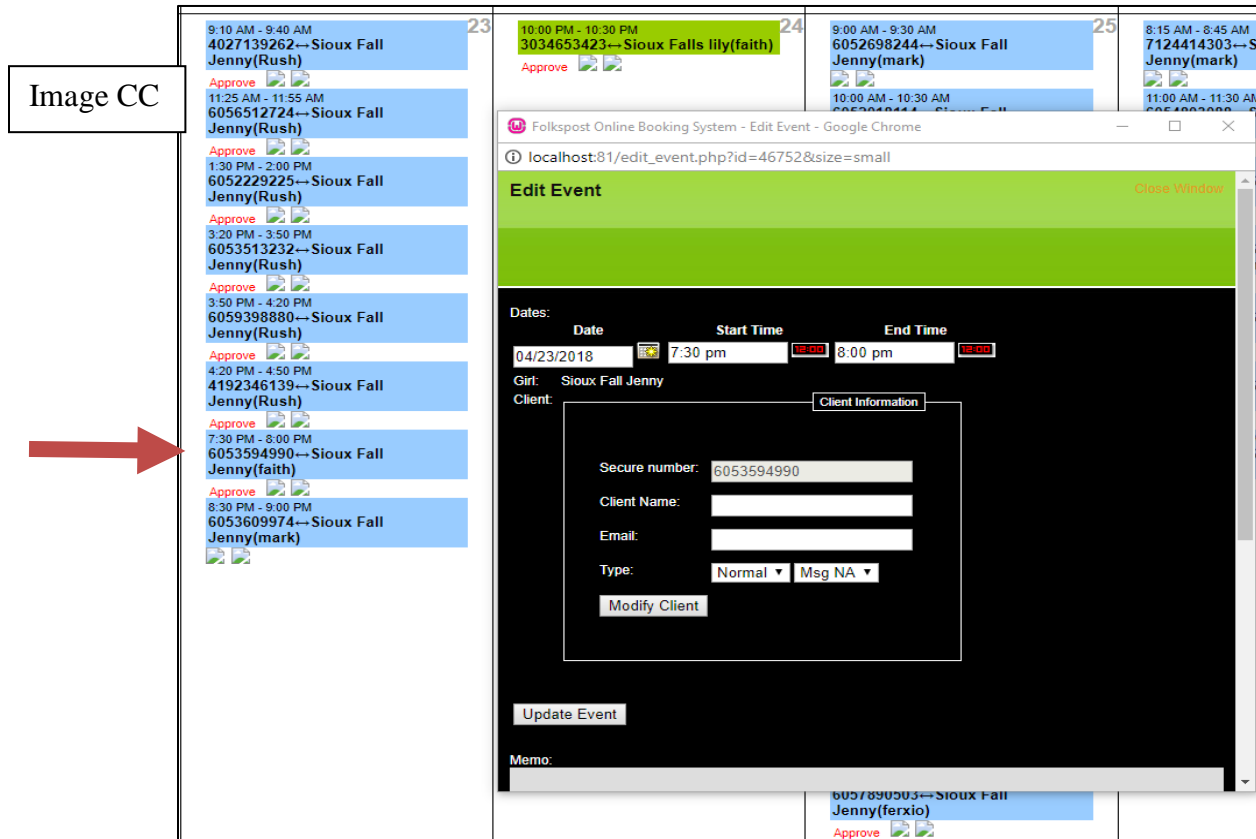
71. Subsequently, on March 26, 2018, Zongtao Chen sends the following: (See Image BB).

Image BB

First name: zongtao
Last name: chen
Country: Canada
Phone: 4167324321



72. A review of the “folkspost.com” returns revealed that on April 23, 2018, the same day as the undercover operation in Sioux Falls, a date was entered into the calendar from “7:30-8:00 p.m, Sioux Fall – Jenny (faith).” The phone number within that appointment was (605) 359-4990, which is the number belonging to the man who was interviewed after he left the hotel room. (See Image CC).



G. Online Presence – Subject Domain Names

Seattle Backpage Investigation – Weixuan Zhou’s Involvement in STOs

73. In 2016, FBI Seattle Washington Division was investigating STOs. They suspected from reports and records that Weixan Zhou was a principal facilitator in a Chinese STO that was recruiting Chinese women in China and North America to work as prostitutes in the United States, and Canada. Seattle FBI determined the following:

Declaration of Special Agent June Piniewski

**Attachment B PAGE 38
Complaint *In Rem*
FOR FORFEITURE**

a. Zhou was financing voluminous amounts of prostitution-related Backpage advertisements through the U.S. and Canada. Zhou purchased airline tickets for Chinese females who had been arrested for prostitution and received money in the form of cash deposits into his bank account and through Western Union wires.

b. A Washington state search warrant was served on Backpage for any and all records associated with the two phone numbers related to ads involving undercover prostitution stings in June 2014, and all other ads that identified as being likely related based upon similarities in grammar, formatting, and language. Backpage's returns showed that all the ads were purchased by four individuals all using the same e-mail account, angelnetadvertisement@hotmail.com. One of the individuals who purchased these ads was Zhou. Most of the IP addresses associated with this email account in communication with Backpage were either from the city of Guangzhou, Guangdong, China, or from the province of Ontario, Canada. Subsequent Backpage records also showed that Zhou was operating in the Western District of Washington, across the United States, and in Canada and other countries.

c. The Backpage ads obtained were dated from November 2012 through February 2016. The requests for Backpage records had been based upon specific known phone numbers used in Backpage ads, or based upon subject names, or e-mail addresses. Approximately 86,000 unique ads have been collected. Of these ads, approximately 78,000 were purchased by users using the e-mail address of angelnetadvertisement@hotmail.com (or a derivative that has "re" or "tor" added). The cost of these ads totaled approximately \$843,000.

d. The data from Backpage also revealed that ads were being placed for cities all across the United States. Seattle, Houston, Dallas, and the San Francisco area had over 5,000 ads each in that three-year period. Chicago was the next largest city in terms of ad volume.

Declaration of Special Agent June Piniewski

**Attachment B PAGE 39
Complaint *In Rem*
FOR FORFEITURE**

e. Financial records obtained for Zhou show that in 2014 alone, Zhou spent approximately \$432,500 on Backpage ads (Wells Fargo credit card ending in 4578). Zhou's mother, Xiaolin Chen spent approximately \$111,596 on Backpage ads from approximately January 2015 to June 2015.

Subject Domain Names in Chen STO

74. In the current, Portland-based investigation, I have found approximately 327 websites that I believe the Chen STO uses or has used for online solicitation of Asian prostitution. Of the 327 sites, approximately twenty-five of the domains are hyperlinked within the "supermatchescort.com" website and associated to the email supermatchescort@gmail.com. (See Image DD, a compilation of some of the 327 homepages).

Image DD



75. On or about November 2018, the FBI accessed publicly available information regarding twenty-five domains associated with the email address supermatchescort@gmail.com. (See Image EE, the twenty-five domain names).

Image EE

www.supermatchescort.com	www.saltlakecityasianescort.com
www.asianescrotsatlanta.com	www.sandiegoasianescort.com
www.dallasescortasian.com	www.seattleasianescorts.com
www.denverescortasian.com	www.siouxfallsasianescort.com
www.fargoasianescort.com	www.tacomaasianescort.com
www.fortcollinsasianescort.com	www.tucsonasianescort.com
www.kansasasianescort.com	www.providenceasianescort.com
www.laasianescort.com	www.calgaryasianescort.com
www.milwaukeeasianescort.com	www.torontoescortsasian.com
www.minneapolisasianescort.com	www.edmontonasianescort.com
www.nyescortasian.com	www.melbourneescortss.com
www.oaklandasianescort.com	www.sydneyasianescorts.com
www.portlandasianescort.com	

76. Using Domaintools—an open source tool that queries WHOIS records, passive Domain Name Service (DNS) data, IP addresses, hosting data, and other DNS information—investigators learned that the twenty-five domains were hosted on IP address 64.50.176.48, along with hundreds of other domains.²

77. Records from Domain.com revealed that for all twenty-five domain names, the subscriber was Weixuan Zhou, with an email address of rastait_mz@hotmail.com, a telephone number of 213-431-0920. The billing information for this account showed the card holder name as Weixuan Zhou and a billing address: ti yu lu no. 613 Guang Zhou, China.

78. Most of the other hundreds of domains hosted on the same IP address shared the same or similar registration information: registered to Weixuan Zhou through Domain.com, LLC, with historical registrant email information identified as bata_intl@hotmail.com or rastait_mz@hotmail.com.

² I learned that prior to seizure in January 2019, several of these domains changed to resolve to IP address 64.50.169.107.

79. Credit card activity shows Weixuan Zhou paying Domain.com for these domains from August 2012 to June 2018. Financial records for Zhou, from August 16, 2012 through June 1, 2018, show payments made via credit card to Domain.com totaling \$11,202.04. One specific example shows that Zhou's Wells Fargo credit card made multiple payments to Domain.com in September 2014. This credit card's September 2014 balance was paid down from Weixuan Zhou's Wells Fargo checking account. The source of these funds originated from cash deposits at banks in Texas, Colorado, Oregon, Washington, and California.

80. Records from PayPal showed that beginning on or around February 15, 2018, and continuing through October 10, 2018, the PayPal account linked to rastait_mz@hotmail.com sent 147 transactions totaling \$6,150.14 to Domain.com. The subpoena return also showed on or around January 31, 2016, and continuing through September 2017, the PayPal account linked to bata_intl@hotmail.com sent 169 transactions totaling \$10,241.74 to Domain.com. The total payments sent to Domain.com from Zhou's two PayPal accounts were approximately \$16,391.88.

Server Hosting for Chen STO - Lunarpages

81. According to additional open source research, IP address 64.50.176.48 is registered to Lunarpages, a hosting company based in Orange, California. Grand Jury subpoena records and returns from Lunarpages revealed registration information for this IP address. The account owner was identified as Weixuan Zhou, user name angel165, email address rastait_mz@hotmail.com, physical address tian xing bie lu no.106, Shang Hai, China. Furthermore, Lunarpages advised that Zhou's account is related to the use of one physical server which hosts 503 domains. According to publicly available information on these domains, the

following authoritative nameservers are associated with these domains: ns1.angelnethost.com and ns2.angelnethost.com.

82. On or about March 1, 2017, Zongtao Chen's Bank of America checking account ending in x9683 made a purchase of \$77.70 to Lunarpages Webhost. On or about March 9, 2017, this amount was returned to the same bank account.

Server Hosting for Chen STO - DreamHost

83. As stated above, a search of the publicly available WHOIS records revealed folkspost.com is assigned to IP address 64.90.44.191. I also learned from publicly available records that this IP address is registered to DreamHost, LLC. Records obtained from DreamHost revealed that the Web ID associated with the account containing folkspost.com is "junsun1," the registered user for this account is Junfeng Sun, with addresses and phone numbers for Southern Ontario locations. Folkspost.com is the only domain associated with this Web ID. Payment for this hosting account was made from Paypal email hotsjf@gmail.com and a credit card under the name of Junfeng Sun.

Summary of Attachment A

84. Attachment A shows a compiled list of 500 active domains believed to be associated to Weixuan Zhou and organized as such: Domain, Registrant, Registrant Email, Registrar, Hosting Provider, Nameserver 1, and Nameserver 2. A search of the publicly available WHOIS domain name registration records revealed the **Subject Domain Names'** registration information and registrar; this information is contained in Attachment A, where available. Publicly available WHOIS records also revealed the **Subject Domain Names'** IP addresses, which I learned are hosted at the company listed in Attachment A. Because all **Subject Domain Names** are ".com" domains, Verisign is the top-level registry for all.

Declaration of Special Agent June Piniewski

**Attachment B PAGE 43
Complaint *In Rem*
FOR FORFEITURE**

85. All of the **Subject Domain Names** have one or more of the following connections to STOs: (1) directly connected to the Chen STO (such as folkspost.com, supermatchescort.com, and the twenty-five related websites listed in Image EE), (2) are paid for or registered by Weixuan Zhou and the website name is indicative of prostitution activity, consistent with the Chen STO, and/or (3) are hosted on angelnethost server, which hosts supermatchescort.com, contains hundreds of prostitution-related websites, and is controlled by Weixuan Zhou.

86. On November 15, 2018, Mark Chen and others were indicted by a Federal Grand Jury in the District of Oregon and arrest warrants were issued. In January 2019, Mark Chen and others involved in the Chen STO were arrested on those warrants.

87. On January 14, 2019, The Honorable Judge John V. Acosta authorized seizure warrants for the **Subject Domain Names** and **Subject Server Accounts**. The **Subject Domain Names** currently point to a government-controlled server indicating that the domains have been seized pursuant to a seizure warrant. The **Subject Server Accounts** are currently locked down by the server provider pursuant to the seizure warrant pending forfeiture proceedings.

CONCLUSION

88. Based on the information contained in this declaration, I submit there is probable cause to believe that the **Subject Domain Names** and **Subject Server Accounts** are property that have been used or are intended to be used to commit or to facilitate the commission of a violation of 18 U.S.C. § 2421, namely interstate transportation of an individual for the purpose of prostitution. The **Subject Domain Names** and **Subject Server Accounts** are therefore subject to forfeiture pursuant to 18 U.S.C. § 2428(b).

89. I have presented this declaration to Assistant United States Attorney Julia Jarrett who has advised me that in her opinion, the proposed complaint is supported by probable cause.

I declare under penalty of perjury that the foregoing is true and correct pursuant to 28 U.S.C. § 1746.

Executed this 16th day of July 2019.

s/ June Piniewski
JUNE PINIEWSKI
Special Agent, FBI